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1989

# MONTANA

## Department of Highways

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# AFFIRMATIVE ACTION PLAN



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MONTANA DEPARTMENT OF HIGHWAYS  
1988 AFFIRMATIVE ACTION PLAN ACCOMPLISHMENTS  
1989 AFFIRMATIVE ACTION PLAN

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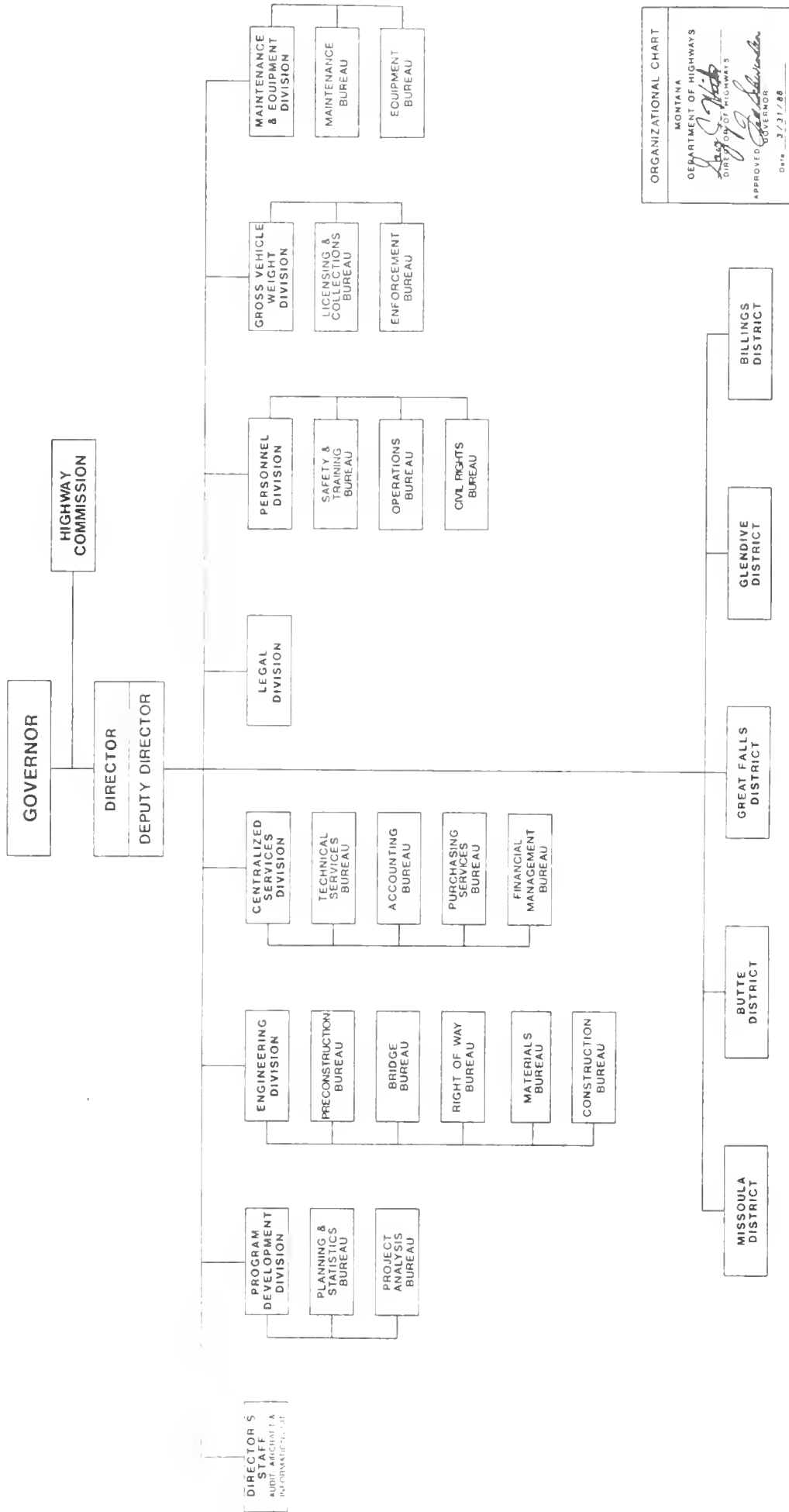


MONTANA DEPARTMENT OF HIGHWAYS  
ORGANIZATIONAL CHART

PERSONNEL DIVISION  
ORGANIZATIONAL CHART



# MONTANA DEPARTMENT OF HIGHWAYS



ORGANIZATIONAL CHART

MONTANA

DEPARTMENT OF HIGHWAYS

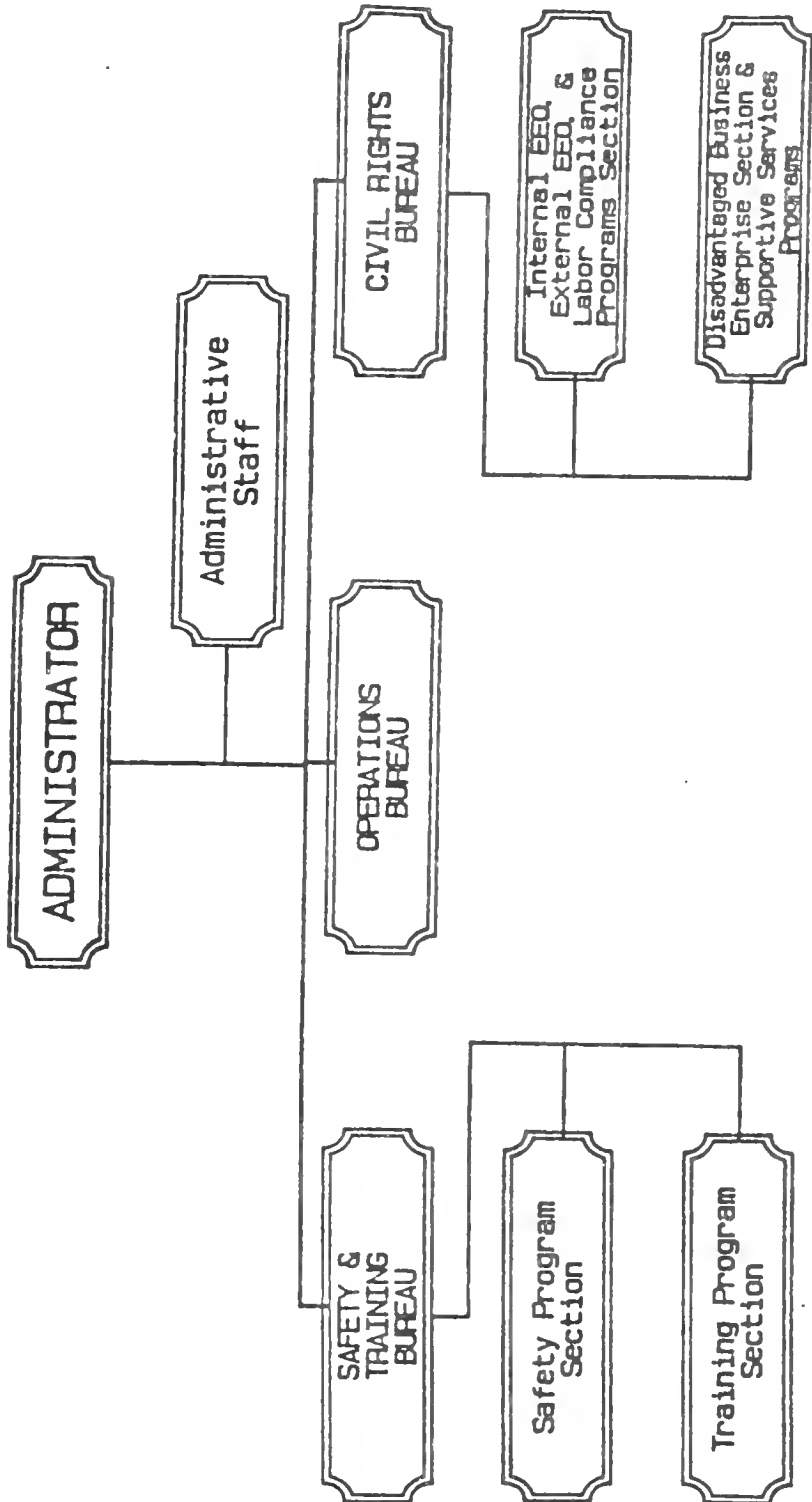
*Ray C. Nick*  
DIRECTOR OF HIGHWAYS

*Ray C. Nick*  
APPROVED GOVERNOR

Date: 3/31/88



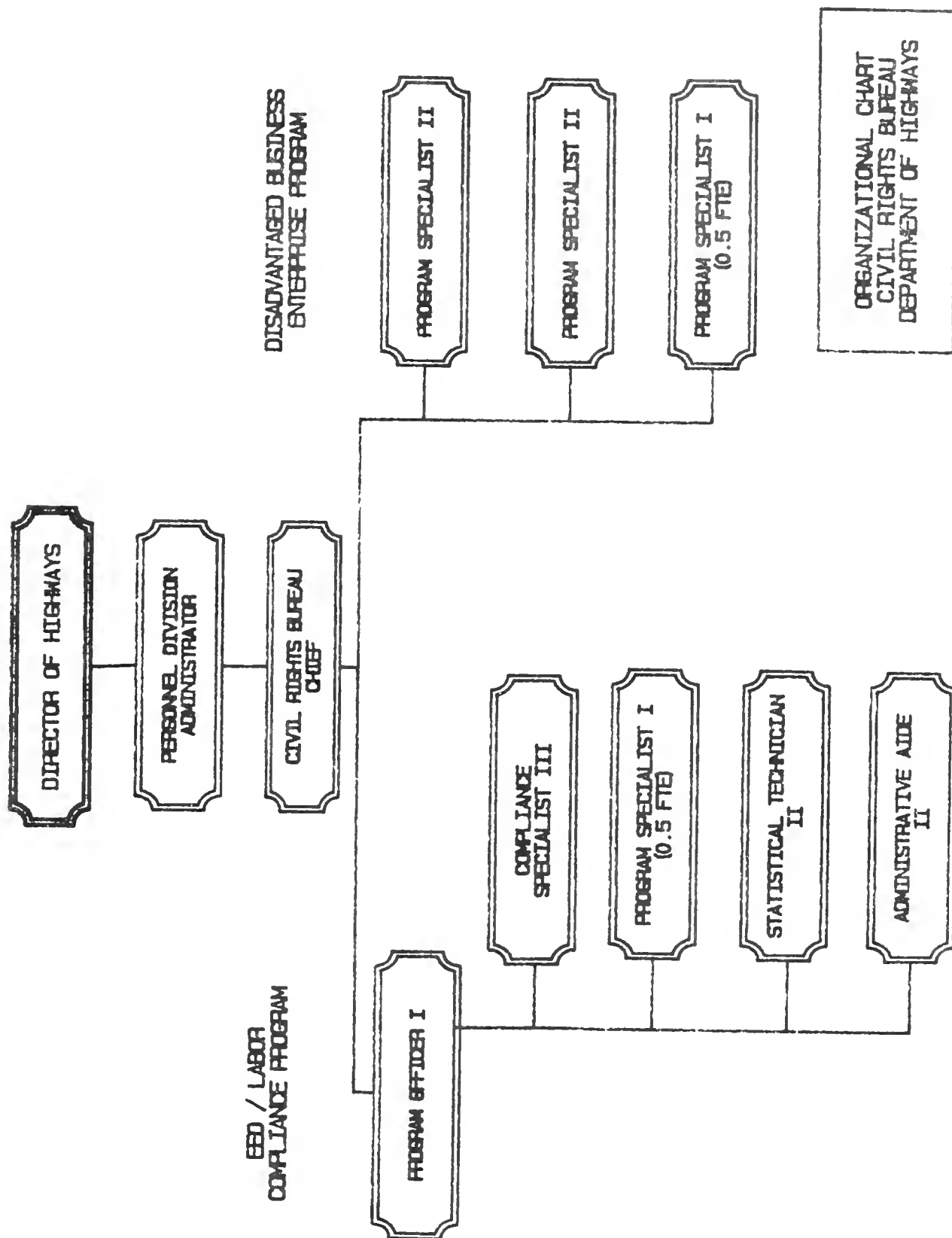
PERSONNEL DIVISION



ORGANIZATIONAL CHART  
PERSONNEL DIVISION  
DEPARTMENT OF HIGHWAYS



# CIVIL RIGHTS BUREAU



ORGANIZATIONAL CHART  
CIVIL RIGHTS BUREAU  
DEPARTMENT OF HIGHWAYS



POLICY STATEMENTS



## EQUAL EMPLOYMENT POLICY

The Montana Department of Highways is an equal opportunity employer. The Department assures that no person shall, as provided by federal and state civil rights laws, be denied employment or otherwise be subjected to discrimination in any terms or condition of employment.

Title VII of the 1964 Civil Rights Act as amended provides that no person on the grounds of race, color, religion, sex, or national origin be discriminated against in employment. In addition, other federal and state laws prohibit discrimination based on age, handicap, marital status or political belief.

The Civil Rights Bureau, Personnel Division, of the Montana Department of Highways is responsible for monitoring Title VII and other civil rights laws, investigating complaints and other related civil rights activities.

11/29/88  
Revised Date

Gary J. Wicks  
Gary J. Wicks, Director



## SEXUAL HARASSMENT POLICY STATEMENT

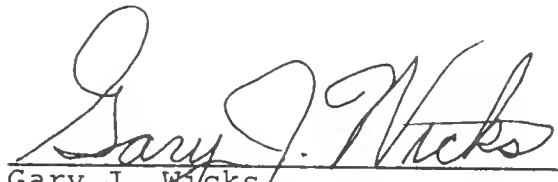
Employees of the Department of Highways are entitled to the opportunity to work in an environment free of discrimination, whether it is based on sex, race, color, religion, national origin, marital status, political belief, age or handicap. Sexual harassment is one form of discrimination that undermines the integrity of employment relationships, lowers morale, interferes with productivity, and adversely affects the careers of Department employees. Sexual harassment, which affects employment decisions or creates an offensive working environment, is both a prohibited personnel practice under the Montana Human Rights Act, the Governor's Executive Order No. 7-82, and a violation of Title VII of the Civil Rights Act of 1964.

A mutually acceptable relationship can turn into sexual harassment if unwelcome advances are continued. Department employees should distinguish mutual, acceptable, social relationships, which do not encroach on the working environment, from sexual harassment. Any deliberate or repeated unsolicited comments, gestures, or physical contact of a sexual nature, which are unwelcome, constitute sexual harassment.

State employment demands from each of us the highest standards of honesty, integrity, and impartiality when carrying out the business of the Department of Highways. Sexual harassment and other conduct which violates these standards will not be condoned or tolerated. It is the policy of the Department of Highways to take direct and immediate action when informed of violations and enforce the full range of liability and protection created by Title VII, the Montana Human Rights Act, and the Governor's Executive Order No. 7-82. Each of us is personally responsible for making this policy work.

Date

11/28/88

  
\_\_\_\_\_  
Gary J. Wicks  
Director of Highways



PART I - EXTERNAL

PART II - INTERNAL



Part I  
Contract Compliance  
Affirmative Action Plan

A(1) Accomplishments of the past year

This section is based on the calendar year beginning January 1, 1988 through November 1, 1988.

The Civil Rights Bureau provided a special training session for contractors concerning Compliance Reviews. They were instructed on the items required to be submitted prior to a review, how to prepare a utilization analysis and where to obtain the information, and the types of questions asked during a compliance review. This training session was held in April 1988 prior to the start of the construction season.

Seven EEO Compliance workshops were conducted for contractors and Field Project Managers during February, March and April. The final workshop was conducted in September.

Revisions for the Contract Compliance portion of the Civil Rights Manual were published in February for approximately 500 Manual holders. This includes 400 contracting firms.

Perhaps the most ambitious project undertaken in 1988 was an increased emphasis in contract compliance monitoring. This was done by reviewing monthly reports for obvious goal shortcomings, scheduling compliance reviews, providing specialized training and issuance of show cause notices.

A(2) Other Accomplishments

Eleven issues of the DBE newsletter were published. The circulation of approximately 1,000 includes certified DBE firms,

highway related prime and subcontractors, non-highway related firms, and other private and state agencies. General EEO information and EEO regulations were communicated through the newsletter.

Technical assistance related to EEO Contract Compliance has been provided both by telephone and on a one-on-one basis to many contractors this year to assist them in achieving contract compliance and employment goals.

The Monthly Employment Report (EEO-5) was revised and sent to all contractors for use beginning this construction season. The main purpose for redesigning this form was to create a Montana State Report (EEO-5) which is exactly like the federal 1392 report.

Implementation of closer monitoring techniques using these reports has provided a better basis for statistics and determination of goal accomplishments.

B. Changes in established contract sanctions:

none

C. Changes in staffing or organizational structure:

Reorganization of the Civil Rights Bureau occurred providing a total of 1.5 FTEs available for contract compliance allowing both closer monitoring of trainees and EEO compliance.

D. Changes in responsibilities of external EEO coordinator:

none

E. 1988 action item accomplishments:

Action Item 88-1: Montana trainee recruitment, selection and placement.

Objective: Assure training provisions are being accomplished and trainees are being placed on federal-aid highway projects.

Action Taken: In calendar year 1987, an assignment of 32 trainees was made. Upon review, 8 additional trainees were added for a total of 40. However, in 1988 an assignment of 50 trainees was made on federal-aid projects. This 20% increase demonstrates the renewed effort to ensure trainees are assigned to highway projects.

Evaluation: Actual on-site trainee evaluations and interviews by MDOH confirm that realistic, meaningful and productive training is transpiring.

Further Action: Although this action item is completed, MDOH will continue to maintain a level of participation of meaningful training that is consistent with the intent of the program.

Action Item 88-2: Increase CRB efforts to achieve 6.9 percent female employment goals.

Objective: Assure female employment goals in all crafts.

Action Taken: As outlined under the Annual Accomplishments section of this report, a special emphasis has been placed on contractors' employment goal accomplishment.

Evaluation: This emphasis has created an increased awareness on the part of the contractors and appears to generally have increased female employment.

Further Action: If current resources are available, MDOH hopes to continue the method of enforcement established this calendar year.

Action Item 88-3: Present contractor workshops with specific emphasis on contract compliance reviews.

Objective: To assure contractors understand the MDOH compliance review methodology.

Action Taken: A special compliance review workshop was held immediately after the April 1988 bid letting. This workshop was advertised in the DBE newsletter and letters were sent to all prime contractors. New policies, requirements, and preparation of utilization analyses were explained.

Further Action: Further information on this activity is covered in the Civil Rights Manual which is provided to each contractor.

Action Item 88-4: Retain computer data on trainees for federal-aid projects to complete FHWA form on AAP.

Objective: To provide consistent and complete statistical data.

Action Taken: Modifications have been made to some existing computer programs in an effort to provide FHWA with all training data requested.

Further Action: As additional funds become available, supplementary modifications will be made to the existing programs to enhance, streamline, and efficiently provide necessary trainee data. See AI 89-2.

F. Contract Compliance Review Activities:

A goal of six (6) compliance reviews was established for the 1988 construction season. Nine compliance reviews were completed.

It should be noted, however, that Montana does conduct a significant number of on-project site field inspections. These inspections encompass nearly all the criteria of a compliance review including an analysis of goal achievement. Bulletin boards are inspected as well as supervisor and worker interviews conducted. The additional advantage of these field inspections is that the contractors do not receive any advance notice of the visit as they do with the formal review, therefore, "temporary fixes" don't occur just to get them through a pre-announced formal review. Montana considers the F/I program to be mini-compliance reviews.

DATA ON CONTRACT COMPLIANCE REVIEWS  
FOR CALENDAR YEAR 1988

a.	Number of contractor reviews conducted	9
b.	Number of contractors reviewed	9 *
c.	Number of contractors found in compliance	6 **
d.	Number of contractors found in noncompliance	3 ***
e.	Number of show cause notices issued	3
f.	Number of show cause notices rescinded	3
g.	Number of show cause actions still under consideration and unresolved	0
h.	Number of follow-up reviews conducted	0
i.	Number of field inspections conducted	55
j.	Number of consultant reviews conducted	20

\* includes 17 subcontractors

\*\* includes 15 subcontractors

\*\*\* includes 2 subcontractors

MDOH past practice has been to prepare only one FHWA Form 86 report for each project even though the review includes active subcontractors.

Three show cause notices were issued during the reporting period.

The first show cause was issued because the prime contractor had not accomplished minority/female employment goals and had no recruitment procedures in place for on-site foremen to follow.

The second and third show cause notices were issued to prime contractors whose subcontractors had failed to meet employment goals.

G. WITHHOLDING OF PROGRESS PAYMENTS:

none

H. EEO COMPLAINTS AGAINST CONTRACTORS:

none

I. EXTERNAL TRAINING PROGRAMS INCLUDING SUPPORTIVE SERVICES:

The Supportive Services OJT contract was re-awarded to the Laborers - Associated General Contractors (A.G.C.) Training Program for Montana.

The results of the FY 88 contract were that of the 65 applicants who started the intensified two-week long heavy highway construction course, 53 graduated. However, of the 53 graduates, 73½% were female and minority applicants. The established goal for minority and female applicants on the 1987 contract was 30 individuals.

The re-awarded contract for FY 89 requires the recruitment and training of 21 females and minorities. The course has also been increased to 94 hours. As with the previous contract, these classes will be conducted prior to the start of the 1989 construction season. Graduates will also be eligible for advanced training programs when available.

DATA ON TRAINEES FOR PERIOD 1-1-87 THROUGH 12-10-87

SLOTS APPROVED 50

	No. trainees in program on 1-1-88				New trainees enrolled during period				Number dropped out				Number completed program				No. remaining in program on 12-09-88			
	Non-Min.		Min.		Non-Min.		Min.		Non-Min.		Min.		Non-Min.		Min.		Non-Min.		Min.	
	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F
	1	1	10	1	0	0	4	1	1	1	6	2	1	0	0	0	0	1	9	2
Laborers	1	1	10	1	0	0	4	1	1	1	6	2	1	0	0	0	0	1	9	2
Oper App	2	1	4	1	8	3	1	1	8	3	2	1	2	0	0	0	10	3	1	1
Oper OJT	0	0	0	1	1	0	2	0	1	2	2	0	0	0	0	0	0	2	3	0
Team	0	2	2	0	0	1	5	0	1	2	4	0	0	0	1	0	1	2	5	0
Carp	0	3	2	2	1	1	0	1	1	3	0	1	0	0	0	0	1	1	0	1
Iron W.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Cem.Mason	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

(as of September 15, 1988)

Note: Number dropped out includes all who did not complete 500 hours or an apprenticeship program.

J. ACTION ITEMS FOR UPDATE YEAR:

Action Item 89-1: Continue emphasis in the attainment of contract employment goals.

Objective: Assure both minority and female employment goals in all crafts are accomplished.

Background: A review of 1988 construction season employment reports indicates some contractors are not making a good faith effort to achieve employment goals.

Action to be Taken: Develop computer check list of all federal-aid projects and contractor identity. Cross check to ensure all reports are submitted and goals are being met. In the event they are not, follow up with a letter requesting explanation of contract noncompliance

or other appropriate sanctions as necessary.

Target Date: October 1, 1989

Action Item 89-2: Consolidate existing computer programs to capture trainee data for federal-aid projects to complete FHWA form for AAP.

Objective: Consolidation of existing programs will provide requested data in a more efficient manner.

Background: Action item 88-4 required the desired data be obtained to complete the AAP forms. However, funds were not available to completely rewrite the training computer program. With the existing program, it was assumed the data could be gathered. This in fact was not possible.

Action to be Taken: Consolidate existing programs.

Target Date: March 31, 1989.

## PART II - INTERNAL PROGRAM

### A. ACCOMPLISHMENTS FOR PERIOD OF 7/1/87 THROUGH 6/30/88

#### 1. Program Overview

- a. A formal procedure to review randomly chosen selection processes was implemented. Positions in the following EEO 4 categories were reviewed:

Professional	5
Technicians	6
Protective Services	1
Clerical	2
Skilled Craft	5
Service Maintenance	1

The purpose of these reviews was to determine whether the selection process for under represented positions contained adverse impact or artificial barriers. Examples of the kinds of problems identified included: 1. some minimum qualification criteria contained artificial barriers in the area of non job related education and/or experience, 2. some oral and/or written test questions were identified as being potentially discriminatory. Initial implementation of this process was met with limited acceptance by MDOH hiring authorities. As the review process proceeded we have begun to notice more hiring authorities voluntarily requesting the CRB to review individual selection processes. In some instances, hiring authorities have identified artificial barriers in their processes.

- b. Each District and Administrative Area received a work force analysis for the program year. The EEO Program Manager met with each of the Administrators (except the Legal and Personnel Divisions) and their

individual Bureau Chiefs or supervisors to discuss the analysis. The following topics were discussed: a) EEO 4 categories including what classifications are contained in each category; b) availability analyses for under represented positions; c) identification of under represented positions; d) suggestions were provided to surmount under represented positions; and e) implementation of the selection review process.

- c. All seven Indian reservations were visited during the program year. During each of the visits MDOH hiring procedures were discussed with TERO officers. Glendive District placed employment advertisements in the local Native American newspaper and made arrangements for testing of applicants in the Tribal complex. The Northern Cheyenne TERO staff visited the CRB to discuss hiring procedures and contracting requirements. The CRB made arrangements for the Northern Cheyenne contingent to meet with Program Development and Contract Plans personnel. External position postings were sent to TERO Officers. Billings District Personnel met with Northern Cheyenne TERO staff to discuss why their applicants have a higher failure rate on math tests than non-minority applicants. The Missoula District was successful in recruiting a temporary female from the Flathead Community College after lines of communication were established.
- d. The MDOH EEO Program Manager and the Great Falls District Centralized Services Supervisor attended and provided an hour presentation to the annual Women in Transition (WIT) Convention in Great Falls. Topics discussed included both in-house and external hiring procedures as well as entrance requirements for construction related training centers. As a result of this meeting, three individual WIT Program Directors

invited the EEO Program Manager to provide presentations to their respective clients. One of the WIT Program Directors requested additional information relative to MDOH computer staffing requirements. The CRB set up a day long training program for her and as a result she will be able to provide some of the advanced computer skills needed by MDOH to her clientele.

#### PROGRESS ON ACTION ITEMS IN PREVIOUS REPORT

Action Item 88-1: Increase female representation in applicant pool

Action To Be Taken: Establish lines of communication with identified female referral sources or other referral sources likely to yield qualified female applicants. Provide information regarding MDOH permanent and temporary selection process to identified female referral sources in each District. Prepare and submit to the Civil Rights Bureau a quarterly report indicating results of contacts.

Action Taken: The MDOH EEO Program Manager and the Great Falls District Centralized Services Supervisor (DCSS) attended the Women In Transition (WIT) state convention. A booth was set up showing graphics and photographs of women in the construction industry (both internally and externally). A 60 minute oral presentation describing internal/external hiring processes, OJT/DBE Supportive Services and the external Contract Compliance Program was provided.

The EEO Program Manager has attended training programs conducted by five different area WIT offices to present information regarding internal/external hiring. These presentations included information about completing applications, interviews, what to expect on a project site, etc. The Glendive Personnel Specialist provided similar information to a Business Communications Class at Dawson Community College.

A female referral source list was provided to each MDOH District office and updates were provided on a quarterly basis. Great Falls, Missoula and Glendive Districts have established lines of communication with identified female referral sources. Missoula District placed three females as a result of their recruitment efforts.

Applicant flow analysis indicated that females were not applying for engineering positions. The CRB conducted a survey of the engineering colleges within an 800 mile radius of Montana. The survey indicated that while there are some females graduating from highway related engineering programs, their numbers are very low. MDOH is providing external engineering vacancy posting notices to the placement officers of those colleges, however, no applications have been received from them to date.

Evaluation: During the past year an excellent rapport has developed with the various WIT organizations in the State. The increased communication from the CRB and the District Offices should result in more positive placements during the next program year.

Further Action: Since MDOH still has positions which are under represented by females this action item will continue.

ACTION ITEM 88-2: Improve female representation in MDOH.

Action To Be Taken:

- (a) Provide copy of under representation analysis and area/district work force analysis to each District Engineer and Division Administrator.
- (b) Develop systematic procedure to monitor selection process in specific under represented classifications for adverse impact and barrier analysis. Provide procedure to area Administrators and District Engineers.
- (c) Implement selection process monitoring procedure for each vacancy.

Action Taken:

- (a) The under representation analysis and area/district work force analysis were provided in a formal presentation to each District Engineer and Area Administrator. The presentation was generally attended by the Bureau Chiefs and Supervisors in each District or Administrative area (except Personnel and Legal Divisions).
- (b) A systematic procedure was developed to monitor the selection process for under represented positions. This process includes a comparison of the class specifications and the position descriptions with the posting notice to assure that the posting notice described the position in job related terms. The second part of the procedure involved a review of the minimum qualification criteria, the oral interview questions with model answers and the written test questions with model answers. The purpose of this review was to assure that adverse impact or artificial barriers were not present in the selection process.
- (c) The selection process monitoring procedure was implemented in January 1988. Twenty selection processes have been reviewed.

Evaluation:

- (a) Providing the statistical data to each Area Administrator and District Engineer has given them an opportunity to analyze their own individual workforce. Employment goals have become more meaningful on a daily basis not just something they hear about once a year. The CRB is now receiving calls from supervisors asking for advice on how to recruit for positions because "my workforce analyses indicates I'm under represented."
- (b) The procedure to monitor selection processes has resulted in a valuable educational tool, not only for the CRB staff but also for supervisors. Supervisors have begun to review their selection criteria more carefully and seem to have gained a better understanding of the non-job related criteria they had been using in their selection processes.

- (c) The process was initially met with some resistance from hiring authorities, however, as we became more adept with the process, more supervisors began to recognize its value. Many supervisors have begun making voluntary requests for the CRB to review a selection process before it is implemented.

The activities in this action item will be carried forward as a part of the CRB normal work activities.

ACTION ITEM 88-3: Monitor external recruitment/selection procedures in Districts where reservations are located.

Action To Be Taken:

- (a) Establish lines of communication with appropriate reservations referral sources or other referral sources likely to yield qualified minority applicants. Provide information regarding MDOH permanent and temporary selection process to identified minority referral sources in each District. Prepare and submit to the CRB a quarterly report indicating results of contacts.
- (b) Determine where minorities drop out of selection process for temporary positions and provide data to appropriate tribal authorities.
- (c) Implement selection process monitoring procedure for each vacancy.

Action Taken:

- (a) Each District Centralized Services Supervisor and/or Personnel Specialist made a positive effort to contact the employment placement officers on the seven reservations. Lines of communication have been reestablished on all seven reservations as a result of these efforts. Missoula District also established lines of communication with the college located on the Salish Kootenai Reservation which resulted in the placement of a Native American female. Glendive and Billings Personnel Specialists have met with

appropriate tribal officials to discuss the areas where their respective Native American applicants drop out of the selection process.

External vacancy posting notices are now being sent to the reservations by the CRB.

- (b) The Glendive District has developed a computerized program to aid in determining where minorities drop out of a selection process. This program has been made available to the other MDOH Districts and training in its use will be provided in the near future.
- (c) See Items (a) and (b) above.

Evaluation:

The CRB and the District Offices have made a concentrated effort to reestablish lines of communication with the seven reservations in Montana. During previous years Native Americans were not applying for positions in any significant numbers. It is our hope that during the upcoming program year we will see more Native Americans applying for permanent positions as a result on the intense communications efforts made by the District Offices and the CRB this year.

Further Action:

The CRB and the District Offices will continue to keep the lines of communication open with the reservations during the program year.

ACTION ITEM 88-4: To comply with FHWA one percent criteria, develop statistical analyses for Hispanics.

Objective: To determine whether Hispanics are affected by adverse impact in MDOH hiring practices.

Action Taken: We have not received written concurrence from FHWA that their requirement for two percent still applies. EFOC requirements are for one per cent. As of this date we have not requested the Montana Department of Administration to develop statistical data for Hispanics on the PPP reports.

Evaluation: No action taken to date.

Further Action: None

ACTION ITEM 88-5: Increase recruitment activity for "other" minority groups.

Objective: Identify and provide information regarding MDOH hiring practices likely to yield "other" minority group persons.

Action Taken: The Montana Job Service Office was unable to identify any organized groups likely to yield Hispanic or Asian American applicants. The CRB was able to identify three groups in Billings who work with Hispanics in the area, however, none of these groups is involved with "placement" activities. One of the groups is involved with health care and the other two are involved in community awareness activities. The CRB agreed to provide copies of vacancy postings to these three groups and to meet with them in the near future to explain our hiring practices.

ACTION ITEM 88-6: Monitor for adverse impact in training opportunities for females and minorities.

Objective: To assure adverse impact does not occur

Action Taken: Due to time constraints, very little was accomplished with this action item during the program year. Review of the statistical data base indicated the method in which statistics are being captured may be providing false information. Plans are being developed to revise the existing data base to provide more accurate information.

Evaluation: Although this action item was not completed steps have been implemented to establish meaningful data.

Further Action: This action item will be carried forward.

2-B: ACTION ITEMS FOR UPDATE YEAR

ACTION ITEM 89-1: Increase female representation in applicant pool.

Objective: To correct female under representation in non-traditional positions

Background: Barrier analysis and adverse impact studies indicate females are not applying for certain job groups at the rate they appear to be represented in the labor force.

Action to be Taken: Provide formalized training to identified female referral groups to include but not be limited to: (a) MDOH hiring practices for permanent and temporary positions, (b) familiarization with construction crafts and union bargaining agreement requirements, (c) availability of training programs for their clientele (external).

Responsible Official: Civil Rights Bureau Chief, EEO Program Manager, MDOH Personnel Specialists

Target Date: First Quarter of 1989

ACTION ITEM 89-2: Monitor external recruitment/selection procedures in Districts where reservations are located.

Objective: To correct underrepresentation of minorities in areas where a substantial minority population exists.

Action To Be Taken: Maintain lines of communication with reservation placement personnel. Evaluate where minority applicants drop out of the system. Provide formalized training to identified minority referral sources to include the same topics described in Action Item 88-1.

Responsible Official: District Centralized Services Supervisors, District Personnel Specialists, EEO Program Manager, Civil Rights Bureau Chief.

ACTION ITEM 89-3: Monitor for adverse impact in training opportunities for females and minorities.

Background: Conversations with some District Personnel Specialists, females in non-traditional roles and some minority

employees indicates that females and minorities may not be receiving the same opportunities for informal training as white males.

Objective: To assure that adverse impact in training is not occurring.

Action To Be Taken: Review randomly selected maintenance and construction work crews which contain minorities or females to ascertain if there is disparity in work assignments.

Responsible Official: Civil Rights Bureau Chief, EEO Program Manager, District Centralized Services Supervisor, District Personnel Specialists

ACTION ITEM 89-4: Determine need for an MDOH handicap affirmative action plan.

Background: The Montana State EEO Coordinator has requested each State agency to review handicap needs within their own agency.

Objective: To assure the needs of the handicap are being met and to assure that disparate treatment is not occurring in the selection process.

Action To Be Taken: Provide handicap training to supervisors.

Responsible Official: Civil Rights Bureau Chief

## STATISTICAL DATA

1. Recruitment
2. Recruitment Results
3. Number of Promotions
4. Merit Award Program
5. Female Training Analysis
6. Minority Training Analysis
7. Progress - Female Hiring Goals
8. Progress - Minority Hiring Goals
9. Employment Gains Table
10. Five Year Plan
11. Applicant Flow Data
12. Separation Totals
13. Employer Reconciliation Figures
14. EEO-4 Report

1980 Census Population For Montana

Total Population	786,690	100%
White	740,148	94.1%
Black	1,786	0.2%
American Indian, Eskimo, Aleut	37,270	4.7%
Asian and Pacific Islander	2,503	0.3%
Persons of Spanish Origin	9,974	1.3%
Persons not of Spanish Origin	688,065	98.7%

Montana  
Underrepresentation Information  
Total State Population as of 1980

	<u>Number</u>	<u>Percent</u>
Total Population	652,717	100
White	626,358	96.0
Black	2,471	0.4
Native American	19,953	3.1
Asian/Pacific	2,292	0.4
Remaining Races	1,643	0.3
Hispanic, All Races	3,474	0.5

NUMBER OF COMPLETIONS RECEIVED DURING YEAR

<u>NO.</u>	<u>NAME</u>	<u>TITLE</u>
1	RACE/SEX	CURRENTLY UNDER REVIEW

NUMBER OF COMPLETIONS

No promotions took place during the program year. All positions are filled by the regular exam and selection process. However, we have a promotion process.

MDOH AWARDS PROGRAM FOR PROGRAM YEAR

	WHITE MALE	WHITE FEMALE	N A MALE	N A FEMALE	OTHER MNTY MALE	OTHER MNTY FEMALE
Nominated for Award	43	13 22%	2 3%	0	1 2%	0
Received Award	13	2 11%	2 11%	0	1 6%	0

Those who did not receive the award did receive letters of commendation from the Director of Highways

This report is the same as last year's report because the actual award took place during the subject program year. Awards for 1988 will not occur until the next AAP program year.

FEMALE TRAINING  
ANALYSIS

<u>Officials/Administrators:</u>	ADVERSE IMPACT
4 Average hours provided to females	yes
5 Average hours provided to males	
\$22.00 Average spent for females	yes
\$29.00 Average spent for males	
<u>Professionals:</u>	
6 Average hours provided for females	no
6 Average hours provided for males	
\$18.00 Average spent for females	no
\$12.00 Average spent for males	
<u>Technicians:</u>	
6 Average hours provided for females	no
7 Average hours provided for males	
\$8.00 Average spent for females	no
\$3.00 Average spent for males	
<u>Protective Services:</u>	
9 Average hours provided for females	yes
15 Average hours provided for males	
\$ 2.00 Average spent for females	yes
\$17.00 Average spent for males	
<u>Paraprofessionals:</u>	
* 0 Average hours provided for females	n/a
6 Average hours provided for males	
\$00.00 Average spent for females	n/a
\$12.00 Average spent for males	
* Only five males in the EEO 4 category.	
<u>Office/Clerical:</u>	
7 Average hours provided to females	no
6 Average hours provided to males	
\$ 5.00 Average spent for females	no
\$ .83 Average spent for males	

Skilled Craft:

5 Average hours provided for females	no
4 Average hours provided for males	
\$ 2.00 Average spent for females	yes
\$ 4.00 Average spent for males	

Service/Maintenance:

9 Average hours provided for females	no
4 Average hours provided for males	
\$ 9.00 Average spent for females	no
\$ 2.00 Average spent for males	

Adverse Impact occurs in the number of hours of training provided for Officials/Administrators, Skilled Craft, and Service/Maintenance categories.

See Action Item 89-3

MJH:dh:lii

Attachment

## MINORITY TRAINING ANALYSIS

### ADVERSE IMPACT

#### OFFICIALS/ADMINISTRATORS

\* 0 Average hours provided to minorities  
5 Average hours provided to non-minorities

n/a

\$00.00 Average spent for minorities  
\$28.00 Average spent for non-minorities

no

\* No minorities in category.

#### PROFESSIONALS

8 Average hours provided to minorities  
6 Average hours provided to non-minorities

no

\$10.00 Average spent for minorities  
\$14.00 Average spent for non-minorities

yes

#### TECHNICIANS

6 Average hours provided to minorities  
7 Average hours provided to non-minorities

yes

\$ 5.00 Average spent for minorities  
\$ 4.00 Average spent for non-minorities

no

#### PROTECTIVE SERVICES

11 Average hours provided to minorities  
15 Average hours provided to non-minorities

yes

\$ 1.00 Average spent for minorities  
\$15.00 Average spent for non-minorities

yes

#### PARAPROFESSIONALS

0 Average hours provided to minorities  
6 Average hours provided to non-minorities

\* yes

\$00.00 Average spent for minorities  
\$12.00 Average spent for non-minorities

\* yes

\* Only five white males in category.

OFFICE/CLERICAL

3 Average hours provided to minorities	yes
7 Average hours provided to non-minorities	
\$ .20 Average spent for minorities	yes
\$ 4.00 Average spent for non-minorities	

SKILLED CRAFT

5 Average hours provided to minorities	no
4 Average hours provided to non-minorities	
\$ 3.00 Average spent for minorities	yes
\$ 4.00 Average spent for non-minorities	

SERVICE/MAINTENANCE

4 Average hours provided to minorities	no
5 Average hours provided to non-minorities	
\$00.00 Average spent for minorities	yes
\$ 3.00 Average spent for non-minorities	

Adverse Impact occurs in Office/Clerical, Protective Services, and Skilled Craft. See Action Item 89-3

trmnan

PROGRESS IN FEMALE HIRING GOALS JULY 1, 1987 THRU JUNE 30, 1988

EEO 4 CATEGORY	TOTAL FEMALES		TOTAL HIRING		TOTAL NEW HIRES		TOTAL ACCOMP		WHITE FEMALE NEW HIRE NUMBERS		SPAN		ASIAN AMERICAN		NATIVE AMERICAN		BLACK	
	1987	1988	GOALS	GOALS	1987	1988	1987	1988	1987	1988	1987	1988	1987	1988	1987	1988	1987	1988
OFF ADMIN	2	2	2	2	1	1	NO	1	1	0	0	0	0	0	0	0	0	0
PROFESSIONAL	37	47	3	3	4	YES	4	0	0	0	0	0	0	0	0	0	0	0
TECHNICIANS	77	71	8	8	5	NO	5	0	0	0	0	0	0	0	0	0	0	0
PRO SVCS	12	13	3	3	1	NO	0	0	0	0	0	0	0	0	0	0	0	0
PARAPROF	0	0	1	1	1	YES	1	0	0	0	0	0	0	0	0	0	0	0
CLERICAL	55	61	0	0	10	N/A	10	0	0	0	0	0	0	0	0	0	0	0
SKILLED CRAFT	6	28	0	0	0	N/A	0	0	0	0	0	0	0	0	0	0	0	0
SVCE MNTNC	4	5	2	2	0	NO	0	0	0	0	0	0	0	0	0	0	0	0

Employee selections are subject to bargaining agreements and the Montana Veterans Preference Act.

apfag!

PROGRESS IN MINORITY HIRING GOALS JULY 1, 1987 THRU JUNE 30, 1988

ECO 4 CATEGORY	TOTAL TOTAL				NATIVE AMERICAN		NATIVE AMERICAN		NATIVE AMERICAN		OTHER MINORITY		OTHER MINORITY	
	TOTAL NATIVE AMERICAN	TOTAL OTHER MINORITY	TOTAL 1987	TOTAL 1988	NATIVE AMERICAN HIRING	NATIVE AMERICAN GOAL	NATIVE AMERICAN NEW HIRES	NATIVE AMERICAN GOAL	OTHER MINORITY HIRING	OTHER MINORITY GOAL	OTHER MINORITY NEW HIRES	OTHER MINORITY GOAL	OTHER MINORITY HIRING	OTHER MINORITY GOAL
OFF /ADMIN	1	0	0	0	1	NO	1	NO	0	0	0	0	0	0
PROFESSIONAL	5	6	6	6	1	NO	1	NO	0	0	0	0	0	0
TECHNICIANS	15	6	7	7	2	NO	1	NO	0	0	1	NO	0	0
PROT SVCS	3	1	0	0	1	NO	0	NO	0	0	0	NO	0	0
PARAPROF	0	0	0	0	0	NO	0	NO	0	0	0	NO	0	0
CLERICAL	1	0	0	0	2	NO	0	NO	0	0	2	NO	0	0
SKILLED CRAFT	27	2	4	4	2	NO	0	NO	1	0	0	NO	0	0
SVCE MNTNC	1	2	0	0	1	NO	0	NO	0	0	0	NO	0	0

Employee selections are subject to bargaining agreements and the Montana Veterans Preference Act

**APPENDIX**

OCCUPA- GROUP	TOTAL AVAILABLE (NUMBERS)	AVAILABLE IN LABOR MARKET (PERCENTAGE)		PRESENT IN MDOH-JUNE 30, 1988 (PERCENTAGE)		CURRENT EMPLOYMENT (NUMBERS)		NEEDED EMPLOYMENT GAINS (PERCENTAGE)		NEEDED EMPLOYMENT GAINS (NUMBERS)		
		NATIVE AMERICAN MINORITY	OTHER FEMALE	NATIVE AMERICAN MINORITY	OTHER FEMALE	TOTAL	NATIVE AMERICAN MINORITY	OTHER FEMALE	NATIVE AMERICAN MINORITY	OTHER FEMALE	NATIVE AMERICAN MINORITY	OTHER FEMALE
OFF /ADMN	26735	2.34%	21.12%	0.00%	2.78%	12	0	2	2.34%	10.34%	1	2
PROFESS	14185	1.77%	19.80%	2.31%	21.76%	216	5	47	0.00%	0.00%	0	0
TECHN /ANS	16962	3.94%	30.62%	2.67%	12.65%	561	15	71	1.27%	17.97%	2	11
PROT /LCS	227	3.08%	4.20%	7.32%	15.85%	82	6	13	0.00%	0.00%	0	0
PARAPROF	12321	1.92%	25.34%	0.00%	0.00%	5	0	0	1.92%	25.34%	1	1
OFF/CLELIC	32045	3.55%	60.34%	0.00%	77.22%	79	0	61	3.55%	1.22%	6	0
SKILL CRAFT	22929	4.81%	1.58%	3.98%	1.16%	601	24	4	4.82%	0.91%	1	1
SVC/MNTMC	15323	1.64%	27.06%	4.76%	11.90%	42	2	0	2.80%	15.16%	1	6

## AAPUR9

MDOH employment increased from 1628 employees in 1987 to 1658 employees in 1988. The number of females increased by 19, the number of Native Americans decreased by two and the number of other minorities increased by two.

EMPLOYMENT DATA  
 FIVE YEARING GOAL FOR MINORITIES & WOMEN

SEC & CATEGORIES	1989		1990		1991		1992		1993	
	A.I.	Oth Non	A.I.	Oth Non	A.I.	Oth Non	A.I.	Oth Non	A.I.	Oth Non
	M	F	M	F	M	F	M	F	M	F
Other	0	0	0	0	0	0	0	0	0	0
Professionals	0	0	0	0	0	0	0	0	0	0
Technicians	2	1	0	0	2	1	0	0	0	0
Par Service	0	1	0	0	0	2	0	0	1	1
Para/Professional	0	0	0	1	0	0	0	0	0	0
Office/Clerical	0	2	0	0	0	0	0	0	0	0
Skilled Craft	2	1	0	2	2	2	0	2	2	1
Service/Maintenance	2	1	0	1	0	1	0	0	0	0

STATE OF MONTANA  
DEPARTMENT OF ADMINISTRATION / PERSONNEL DIVISION  
APPLICANT FLOW DATA 07-01-87 THRU 06-30-88

DATE: 07/13/83  
PAGE: 8

## ADVERSE IMPACT ANALYSIS

AGENCY: 5401 DEPT. OF HIGHWAYS

	TOTAL	SEX		UNK	WHITE		MALE	INDIAN	MALE	INDIAN	UNK	MALE	OTHER	UNK
		MALE	FEMALE		MALE	FEMALE								
D-A OFFICIALS/ADMINISTRATORS HIRED	25 4	24 4	1 0	0 0	24 4	1 0	0 0	0 0	0 0	0 0	0 0	0 0	0 0	0 0
D-B PROFESSIONALS HIRED	320 40	256 25	56 14	8 25%	241 24	52 13	3 0	2 20%	3 0	2 100%	0 0	5 0	1 0%	0 0
D-C TECHNICIANS HIRED	824 86	717 76	93 10	14 11%	685 72	90 10	18 2	2 10%	18 2	2 10%	0 0	10 2	1 0	0 0
D-D PROTECTIVE SVC WORKERS HIRED	50 10	40 5	10 13%	4 40%	34 4	3 2	2 0	3 30%	2 0	3 30%	0 0	3 1	0 0	0 0
D-E PARAPROFESSIONALS HIRED	14 4	11 3	3 81%	0 0	11 3	3 1	0 0	0 0	0 0	0 0	0 0	0 0	0 0	0 0
D-F OFFICE AND CLERICAL HIRED	120 24	26 2	90 22	4 44%	23 2	82 20	0 0	4 20%	0 0	2 50%	0 0	1 0	0 0	0 0
D-G SKILLED CRAFT WORKERS HIRED	913 31	872 90	23 10%	18 0	812 82	22 1	42 6	1 0	42 6	0 0	0 0	9 2	0 0	0 0
D-H SERVICE/MAINTENANCE HIRED	127 3	120 3	3 3%	3 0	92 3	3 0	15 0	1 0	15 0	0 0	0 0	5 0	0 0	0 0
TOTAL APPLICANTS	2393	2066	276	51	1922	256	6	13	80	13	0	33	2	0
RED	262	208	53	1	194	47	0	6	8	6	0	5	0	0

\* Selection Ratio  
# Adverse impact

1. The above statistical analysis indicates adverse impact potential in Skilled Craft and Service Maintenance areas.
2. The analysis clearly indicates that when minorities/females apply for positions they are generally being selected in acceptable ratios to white males. MDOH continues to have a recruitment problem.
3. The analysis includes permanent and temporary placements.

# TOTALS BY JOB CATEGORY, SEX, & ETHNIC BACKGROUND

\*\*\*\*\* FULLTIME PERMANENT EMPLOYEES \*\*\*\*\*

JOB CATEGORY	ALL EMPLOYEES				MALE				FEMALE				
	MALE	FEMALE	TOTAL	WHITE	BLACK	SPAN SURNAME	ASIAN AMER.	AMER. INDIAN	WHITE	BLACK	SPAN SURNAME	ASIAN AMER.	AMER. INDIAN
A OFFICIALS/ ADMINISTRATORS	1	0	1	0	0	0	0	1	0	0	0	0	0
B PROFESSIONALS	26	3	29	25	0	0	1	0	3	0	0	0	0
C TECHNICIANS	26	12	38	26	0	0	0	0	12	0	0	0	0
D PROTECTIVE SERVICE	4	1	5	4	0	0	0	0	1	0	0	0	0
E PARA/ PROFESSIONALS	4	0	4	4	0	0	0	0	0	0	0	0	0
F OFFICE/ CLERICAL	1	6	7	1	0	0	0	0	6	0	0	0	0
G SKILLED CRAFT	36	1	37	36	0	0	0	0	0	0	0	0	1
H SERVICE MAINTENANCE	8	0	8	8	0	0	0	0	0	0	0	0	0

MDOH is satisfied that no adverse impact occurred.

Personal Reasons: 7wf, 2wm  
Attend School: 6wm  
Other Employment: 1mm, 5wf, 23mm  
Retired: 1mm, 65wm, 4wf  
Voluntary: 1mf, 7mm, 7wf



EMPLOYEE RECONCILIATION FIGURES:

a. Total employees per EE)-4 Form from 6/30/87	1,628
b. New hires per Sec. 3 of EEO-4 Form for 6/30/88	96
c. Less separations from the chart in the update	(129)
d. Subtotal	1,595
e. Total employees per EEO-4 Form for 6/30/88	1,658
f. Difference	63*

The difference of 63 includes some temporary employees who were hired during the construction season and inadvertently key punched into the PPP system.



EXCLUDE SCHOOLS, SYSTEMS AND EDUCATIONAL INSTITUTIONS  
(Read attached instructions prior to completing this form)

EXPIRES  
5/31/88

DO NOT ALTER INFORMATION PRINTED IN THIS BOX

MAIL COMPLETED  
FORM TO:

## A. TYPE OF GOVERNMENT (Check one box only)

- ☒ 1. State    ☐ 2. County    ☐ 3. City    ☐ 4. Township    ☐ 5. Special district  
☐ 6. Other (Specify) \_\_\_\_\_

## B. IDENTIFICATION

1. NAME OF POLITICAL JURISDICTION (If same as label, skip to Item C)

EEOC  
USE  
ONLY

A

B

MONTANA DEPARTMENT OF HIGHWAYS

2. Address—Number and Street

CITY/TOWN

COUNTY

STATE/ZIP

2701 PROSPECT

Helena

Lewis &amp; Clark 59620

## C. FUNCTION

(Check one box to indicate the function(s) for which this form is being submitted. Data should be reported for all departments and agencies in your government covered by the function(s) indicated. If you cannot supply the data for every agency within the function(s), please attach a list showing name and address of agencies whose data are not included.)

1. FINANCIAL ADMINISTRATION. Tax assessing, tax billing and collection, budgeting, purchasing, central accounting and similar financial administration carried on by a treasurer's, auditor's or comptroller's office and

GENERAL CONTROL. Duties usually performed by boards of supervisors or commissioners, central administrative offices and agencies, central personnel or planning agencies, all judicial offices and employees (judges, magistrates, bailiffs, etc.)

8. HEALTH. Provision of public health services, out-patient clinics, visiting nurses, food and sanitary inspections, mental health, alcohol rehabilitation service, etc.

9. HOUSING. Code enforcement, low rent public housing, fair housing ordinance enforcement, housing for elderly, housing rehabilitation, rent control.

☒ 2. STREETS AND HIGHWAYS. Maintenance, repair, construction and administration of streets, alleys, sidewalks, roads, highways and bridges.

10. COMMUNITY DEVELOPMENT. Planning, zoning, land development, open space, beautification, preservation.

3. PUBLIC WELFARE. Maintenance of homes and other institutions for the needy; administration of public assistance. (Hospitals and sanatoriums should be reported as item 7.)

11. CORRECTIONS. Jails, reformatories, detention homes, half-way houses, prisons, parole and probation activities.

4. POLICE PROTECTION. Duties of a police department, sheriff's, constable's, coroner's office, etc., including technical and clerical employees engaged in police activities.

12. UTILITIES AND TRANSPORTATION. Includes water supply, electric power, transit, gas, airports, water transportation and terminals.

5. FIRE PROTECTION. Duties of the uniformed fire force and clerical employees. (Report any forest fire protection activities as item 8.)

13. SANITATION AND SEWAGE. Street cleaning, garbage and refuse collection and disposal. Provision, maintenance and operation of sanitary and storm sewer systems and sewage disposal plants.

8. NATURAL RESOURCES. Agriculture, forestry, forest fire protection, irrigation drainage, flood control, etc., and

14. EMPLOYMENT SECURITY

PARKS AND RECREATION. Provision, maintenance and operation of parks, playgrounds, swimming pools, auditoriums, museums, marinas, zoo, etc.

15. OTHER (Specify on Page Four)

7. HOSPITALS AND SANATORIUMS. Operation and maintenance of institutions for inpatient medical care.

1. FULL-TIME EMPLOYEES (Temporary employees not included)

JOB CATEGORIES	ANNUAL SALARY (In thousands 000)	TOTAL (COLUMNS B-K)	MALE					FEMALE				
			NON-HISPANIC ORIGIN		HISPANIC	ASIAN OR PACIFIC ISLANDER	AMERICAN INDIAN OR ALASKAN NATIVE	NON-HISPANIC ORIGIN		HISPANIC	ASIAN OR PACIFIC ISLANDER	AMERICAN INDIAN OR ALASKAN NATIVE
			WHITE	BLACK				WHITE	BLACK			
		A	B	C	D	E	F	G	H	I	J	K
OFFICIALS/ ADMINISTRATORS	1. \$ 0.1-7.9											
	2. 8.0-11.9											
	3. 12.0-15.9											
	4. 16.0-19.9											
	5. 20.0-24.9	3	1					2				
	6. 25.0-32.9	7	7									
	7. 33.0-42.9	50	50									
	8. 43.0 PLUS	12	12									
PROFESSIONALS	9. 0.1-7.9											
	10. 8.0-11.9											
	11. 12.0-15.9	2	1					1				
	12. 16.0-19.9	37	22			1		12				2
	13. 20.0-24.9	52	33		1			18				
	14. 25.0-32.9	90	71		1	2	3	13				
	15. 33.0-42.9	35	34					1				
	16. 43.0 PLUS											
TECHNICIANS	17. 0.1-7.9											
	18. 8.0-11.9											
	19. 12.0-15.9	83	53		1		6	28				
	20. 16.0-19.9	137	106		1	1		29				
	21. 20.0-24.9	164	149			1	6	13				
	22. 25.0-32.9	167	161			1	4	1				
	23. 33.0-42.9											
	24. 43.0 PLUS											
PROTECTIVE SERVICE	25. 0.1-7.9											
	26. 8.0-11.9											
	27. 12.0-15.9		1									
	28. 16.0-19.9	59	43				4	10				2
	29. 20.0-24.9	19	18					1				
	30. 25.0-32.9	3	3									
	31. 33.0-42.9											
	32. 43.0 PLUS											
PARA- PROFESSIONALS	33. 0.1-7.9											
	34. 8.0-11.9											
	35. 12.0-15.9	3	3									
	36. 16.0-19.9	2	2									
	37. 20.0-24.9											
	38. 25.0-32.9											
	39. 33.0-42.9											
	40. 43.0 PLUS											
ADMINISTRATIVE SUPPORT	41. 0.1-7.9											
	42. 8.0-11.9	5						5				
	43. 12.0-15.9	43	5					37				1
	44. 16.0-19.9	16	2					14				
	45. 20.0-24.9	15	11					4				
	46. 25.0-32.9											
	47. 33.0-42.9											
	48. 43.0 PLUS											

(Do not include elected/appointed officials. Blanks will be counted as zero)

1. FULL-TIME EMPLOYEES (Temporary employees not included)

JOB CATEGORIES	ANNUAL SALARY (In thousands 000)	TOTAL (COLUMNS B-K)	MALE					FEMALE				
			NON-HISPANIC ORIGIN		HISPANIC	ASIAN OR PACIFIC ISLANDER	AMERICAN INDIAN OR ALASKAN NATIVE	NON-HISPANIC ORIGIN		HISPANIC	ASIAN OR PACIFIC ISLANDER	AMERICAN INDIAN OR ALASKAN NATIVE
			WHITE	BLACK				WHITE	BLACK			
		A	B	C	D	E	F	G	H	I	J	K
SKILLED CRAFT	49. \$ 0.1-7.9											
	50. 8.0-11.9											
	51. 12.0-15.9											
	52. 16.0-19.9	5	4				1					
	53. 20.0-24.9	517	486		4		20	16				1
	54. 25.0-32.9	78	76				2					
	55. 33.0-42.9	1	1									
	56. 43.0 PLUS											
LIVING MAINTENANCE	57. 0.1-7.9											
	58. 8.0-11.9											
	59. 12.0-15.9	6	5					1				
	60. 16.0-19.9	25	21				1	3				
	61. 20.0-24.9	10	8				1	1				
	62. 25.0-32.9	1	1									
	63. 33.0-42.9											
	64. 43.0 PLUS											
5. TOTAL FULL TIME		1658	1390		8	6	48	200				6
INSES 1-64)												

2. OTHER THAN FULL-TIME EMPLOYEES (Include temporary employees)

OFFICIALS/ADMIN.												
PROFESSIONALS	7	3						4				
TECHNICIANS	140	103					5	32				1
PROTECTIVE SERV.	1	1										
PARA-PROFESSIONAL	4	4										
ADMIN. SUPPORT	14	3						11				
SKILLED CRAFT	45	39					3	3				
SERV./MAINT.	17	9					3	5				
6. TOTAL OTHER THAN FULL TIME												
INSES 66-73)	228	161					11	55				1

3. NEW HIRES DURING FISCAL YEAR - Permanent full time only  
JULY 1 - JUNE 30

OFFICIALS/ADMIN.	3	2						1				
PROFESSIONALS	18	14						4				
TECHNICIANS	24	18					1	5				
PROTECTIVE SERV.	5	4										1
PARA-PROFESSIONAL	2	1						1				
ADMIN. SUPPORT	13	3						10				
SKILLED CRAFT	28	27			1							
SERV./MAINT.	3	3										
TOTAL NEW HIRES												
INSES 75-82)	96	72			1		1	21				1



REMARKS (List National Crime Information Center (NCIC) numbers assigned to any Criminal Justice Agencies whose data are included in this report.)

\*\*\* INCLUDE LIST OF AGENCIES IN THIS FUNCTION \*\*\*

CERTIFICATION. I certify that the information given in this report is correct and true to the best of my knowledge and was reported in accordance with accompanying instructions. (Willfully false statements on this report are punishable by law, U.S. Code, Title 18, Section 1001.)

NAME OF PERSON TO CONTACT REGARDING THIS FORM

Walter A. Koch

TITLE EEOC Program Mgr.  
(404) 444-3335

ADDRESS (Number and Street, City, State, Zip Code)

Mont. Dept. of Highways  
2701 Prospect  
Helena, Mt. 59601

TELEPHONE NUMBER  
AREA CODE

DATE

7/21/88

TYPED NAME/TITLE OF AUTHORIZED OFFICIAL

Raymond D. Brown, Chief - Civil Rights  
Bureau

SIGNATURE

*Raymond D. Brown*





